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February 13, 2014

VIA E-MAIL (SCC.CHAMBERS@NYSB.USCOURTS.GOV)

The Honorable Shelley C. Chapman
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *Lehman Brothers Holdings, Inc. v. Dr. H.C. Tschira Beteiligungs GmbH & Co KG et al.* [Adv. Proc. No. 13-01431 (SCC)]

Dear Judge Chapman:

This Firm is counsel for Lehman Brothers Finance AG, in Liquidation, a Swiss corporation ("**LBF**"). LBF is not a party to Adversary Proceeding No. 13-01431. I write pursuant to Local Bankruptcy Rule 7007-1 regarding a disputed discovery issue concerning a Subpoena Duces Tecum dated January 27, 2014 (the "**Subpoena**") sent to LBF's U.S. counsel and signed by counsel for Dr. HC Tschira Beteiligungs GmbH & Co KG and Klaus Tschira Stiftung GGmbH (together, "**Defendants**").

On February 10, 2014, LBF filed a motion to quash the Subpoena [Adv. Pro. Docket No. 25] (the "**Motion to Quash**") pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure on an expedited basis to preserve its rights under Rule 45(d)(2)(B).

On February 12, 2014, the parties had a conference in which they made a good faith effort to resolve the issues raised in the Motion to Quash. However, there is an irreconcilable difference of opinion regarding the legal status of the Subpoena and its enforceability. Accordingly, the parties agree that judicial intervention will be required.

The parties have reached an agreement on the following briefing schedule:

February 24, 2014: Defendants' objection and any cross-motion shall be due.
March 7, 2014: LBF's reply and any objection to a cross-motion shall be due.
March 14, 2014: Defendants' reply on their cross-motion, if any, shall be due.

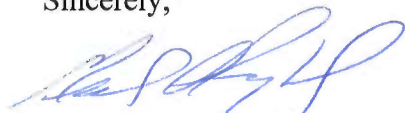
The parties respectfully request that the Court either schedule the informal conference contemplated by Local Bankruptcy Rule 7007-1 or set the matter for a hearing after completion of the briefing schedule.

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The parties will make themselves available if the Court has any questions or concerns regarding the foregoing.

Sincerely,



Michael A. Rosenthal

cc: Counsel for Defendants

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